confession, true or false—a theory which could scarcely merit serious consideration. The decision of the majority of the court, in so far as it is based upon this portion of the evidence, would seem therefore to stand on a somewhat infirm foundation.

DEEDS—SEPARATE WRITINGS CONSTRUED TOGETHER.—Plaintiff sued for the recovery of land and offered in evidence a deed as part of his claim of title. In connection with this deed, and as part of it, plaintiff offered also a separate piece of paper, containing matter of description, continuous with and supplemental to the description of property embodied in the deed proper, and which though not signed, nor referred to in the deed proper, was delivered to the grantee along with the deed and as part of it. *Held,* it was properly received in evidence as part of the deed. *Kyle* v. *Jordan* (Ala. 1914), 65 So. 522.

In view of the law in regard to evidence aliunde the instrument, either will or deed, this decision seems to take a dangerous trend. It is well settled that extrinsic documents *referred to* in deeds may be resorted to for identification of the property or estate intended to be conveyed. *Heffelman* v. *Otsego Water-Power Co.,* 78 Mich. 121, 44 N. W. 1151; *Allen* v. *De Groodt,* 105 Mo. 442, 16 S. W. 494, 1049; *Hoffman* v. *City of Port Huron,* 102 Mich. 417, 60 N. W. 831; *Ford* v. *Belmont,* 30 N. Y. Super. Ct. (7 Rob.) 97; *Watson* v. *Boylston,* 5 Mass. 411. In these cases the emphasis is placed on the reference in one instrument to the other. The court itself makes mention of the analogy in the law of wills that an extrinsic document cannot be treated as a part of a will unless it is distinctly referred to, accurately described, and in actual existence. *Bryan's Appeal,* 77 Conn. 240, 58 Atl. 748, 68 L. R. A. 353, and note, 107 Am. St. Rep. 34, 1 Ann. Cas. 393; *Bryan* v. *Bigelow,* 77 Conn. 604, 60 Atl. 266, 107 Am. St. Rep. 64, and note; *Estate of Young,* 123 Cal. 337, 342, 55 Pac. 1011; *Fickle* v. *Snepp,* 97 Ind. 289, 49 Am. Rep. 449; *Tonnele* v. *Hall,* 4 N. Y. 140; *Baker's Appeal,* 107 Pa. St. 381, 52 Am. Rep. 478. These analogies are refuted by the court, however, and the evidence admitted on the ground that it was continuous, coherent, and consistent with that part of the deed which it purports to supplement. It would seem that to allow the introduction of such evidence without any reference to it in the body of the deed, is to destroy the safeguards of the parole evidence rule.

DIVORCE—WIFE'S REFUSAL TO FOLLOW HUSBAND NOT DESERTION.—Plaintiff and defendant, husband and wife, occupied one-half of a double house owned by the wife's mother who lived in the other half. Difficulties soon arose between defendant and his mother-in-law, and when the situation became unbearable, he moved away to another part of the city. The plaintiff refused to follow him. There was evidence to show that the wife was in poor health, and that her mother aided her in her household duties, and that she had a more comfortable home where she was, than her husband could provide. *Held,* that the wife's refusal to follow her husband did not constitute desertion. *Copping* v. *Termini,* (La. 1914) 65 So. 132.

Generally the husband has the right to choose the domicile of his family as the law imposes on him the duty to provide a home, and the duty implies the right to select the home. *Kennedy* v. *Kennedy,* 87 Ill. 250. But the power lodged in the husband is not without limitations. *Angier* v. *Angier,* 7 Phila. 305. The wife's refusal to follow the husband is not desertion, unless such refusal is unreasonable. *Gleason* v. *Gleason,* 4 Wis. 81. The refusal to follow the husband is not unreasonable, if he has made the change in bad faith; he must choose a reasonable place, and what is a reasonable place must depend upon their finances and their accustomed mode of life. *Vosburg* v. *Vosburg,* 136 Cal. 195. In *Franklin* v. *Franklin,* 190 Mass. 349, the court said: "We can conceive of a change in domicile so plainly unreasonable, in reference to health and welfare of wife, as would justify her in not following him." Poverty of the husband or his inability to provide the wife with an establishment suited to her views and former station of life is not sufficient ground for refusing to follow him. *Messenger* v. *Messenger,* 56 Mo. 329. There are some dicta to the effect that the husband cannot require the wife to leave all her relatives and friends and follow him. *Boyce* v. *Boyce,* 23 N. J. Eq. 337, *Vosburg* v. *Vosburg,* 136 Cal. 195. But these have no judicial support. *Hardenburg* v. *Hardenburg,* 14 Cal. 654, *Hair* v. *Hair,* 10 Rich. Eq. 163. The principal case goes, perhaps, as far as any in support of these dicta. It would seem that by the above authorities the change made by the husband would not have been considered unreasonable.

EASEMENT BY IMPLIED GRANT.—Where the owner of entire premises located on two lots had arranged for and used three feet of one lot as a passage-way to gain access to the rear of the adjoining lot, and such passage-way was notorious, apparent, continuous, highly convenient and very beneficial, and afterwards the premises are severed and the title vested in separate owners; *Held,* that by implication the right to the said three feet as a passage-way became vested in the purchaser of the quasi-dominant estate as a true easement. *Feitler* v. *Dobbins,* (Ill. 1914) 104 N. E. 1088.

There is no question as to what the courts of Illinois consider the requisites of an easement by implied grant, the terms employed being, "continuous," "apparent," and "necessary to the reasonable enjoyment." *Hadden* v. *Shoutz,* 15 Ill. 581; *Morrison* v. *King,* 62 Ill. 30; *Clarke* v. *Gaffeney,* 116 Ill. 362; *Cihak* v. *Klekr et al,* 117 Ill. 643; *Hawkins* v. *Hendricks,* 247 Ill. 517. Defining the latter term, *Newell* v. *Sass,* 142 Ill. 104, says, "It is sufficient that the easement claimed be convenient and highly beneficial." On the question as to what shall constitute the requisites of an easement by implied grant-back or reservation, however, there is a diversity of opinion. *Ingals* v. *Plamondon,* 75 Ill. 118, states that the requisites for implied reservation are first, defacto existence of the quasi-easement at the time of the conveyance; second, that it be continuous, and third, that it be apparent. The later case of *Powers* v. *Heffernan,* 233 Ill. 597 states that it is not essential that such use be a matter of absolute necessity; it is sufficient if it be open and visible and is a reasonable necessity and not a convenience. A comparison of the facts and language of this case and the principal case does not seem to